

Ex. I

**Chen's Counsel's Email to Plaintiff on
April 14, 2022**

Subject: Re: AMERIWAY V CHEN- DEPOSITION OF ZHANG & chen
Date: Thursday, April 14, 2022 at 9:35:23 AM Eastern Daylight Time
From: RICHARD E. SCHRIER
To: xzhang@stratumlaw.com, pwolfgram@stratumlaw.com
CC: wshayne@shaynelawgroup.com, RICHARD E. SCHRIER, richardschrier@gmail.com, jaimohaque@gmail.com

XIYAN/PETE;

I HAVE NO OBJECTION TO HOLDING YOUR DEPOSITION IN PERSON, HOWEVER, THE DEPOSITION OF MS. CHEN WILL HAVE TO BE DONE REMOTELY. ,

PLEASE PROVIDE 3 DAYS WHEN YOU WILL BE AVAILABLE LATER THIS MONTH AND WHAT DATES YOU PROPOSE TO DEPOSE MS. CHEN.

WITH RESPECT TO THE DEPOSITION OF MR. SHAYNE, THAT IS HIGHLY UNUSUAL, IN THAT HE IS THE ATTORNEY FOR MS. CHEN AND ANY ADVICE OR ACTION OR INACTION FOR THAT MATTER ON HIS PART IN CONNECTION WITH HIS REPRESENTATION OF MS CHEN WOULD BE SUBJECT TO ATTORNEY CLIENT PRIVILEGE.

THEREFORE, AT THIS TIME WE DECLINE TO MAKE MR. SHAYNE AVAILABLE FOR A DEPOSITION IN THIS CASE.

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----- Forwarded message -----

From: **Xiyan Zhang** <xzhang@stratumlaw.com>
Date: Wed, Apr 13, 2022 at 3:08 PM
Subject: Re: AMERIWAY V CHEN- DEPOSITION OF ZHANG
To: RICHARD E. SCHRIER <resincourt@aol.com>, Pete Wolfgram(Pete) <pwolfgram@stratumlaw.com>
Cc: wshayne@shaynelawgroup.com <wshayne@shaynelawgroup.com>, RICHARD E. SCHRIER <resincourt@aol.com>, richardschrier@gmail.com <richardschrier@gmail.com>

Richard: